

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PATRICIA PINA,

Plaintiff,

v.

STEPHEN MATTERN, WILLIAM
McCLEAN, EDWARD MURRAY,
SCOTT SAUCHUCK, as they constitute
the Plympton Board of Appeals, not
individually and FRED SVENSON, as he is
Building Inspector and Zoning Officer for
Plympton and not individually and THE
TOWN OF PLYMPTON,

Defendants.

Case No. 03-11949-NG

FILED
2004 JUL 26 A 11:04

U.S. DISTRICT COURT
DISTRICT OF MASS


SECOND SUPPLEMENTAL AFFIDAVIT OF
PATRICIA RENEE PINA

NOW COMES Patricia Renee Pina under oath saying as follows:

- (1) I was born on August 15, 1959 (see attached birth certificate) with a physical condition characterized as, and commonly referred to as "genital ambiguity," in that I had dual sets (i.e. male and female) of genitals. This problem was resolved in my early childhood. I am a woman of Cape Verdean extraction, African-American, who is perceived not to be a woman by persons in positions of power in the Town of Plympton.
- (2) Although some of my features, such as my height and deep voice, are abnormal for a female, I am a woman (see attached birth certificate).
- (3) At various diverse times in my life, other persons have perceived me to be a male, and these perceptions and mistaken observations have led to harmful remarks, assaultive conduct, exclusion and discrimination.
- (4) Upon information and belief the words and conduct of the Town of Plympton officials referred to in my First Supplemental Affidavit are based upon similar misplaced perceptions and have resulted in the discriminatory denial of my plans to move forward with the development of my agricultural business plan.

- (5) There is both comparative and circumstantial evidence that decision-makers and individuals in positions of power (individuals responsible for reviewing my plans to move forward with the development of my agricultural plan) in the Town of Plympton have made decisions based on their false perceptions of my sexual orientation and gender.

Signed under the pains and penalties of perjury this 20th day of July 2004.


Patricia Renee Pina

CERTIFICATION OF VITAL RECORD

STATE OF NORTH CAROLINA

CERTIFICATE OF LIVE BIRTH

1. Name Patricia Renee Pina2. Sex female3. Birthplace Camberland CountyNC 4. Birthdate August 15, 1959
PARENTAGE

Father

5. Name Edwin James Pina, Jr.

Mother

8. Maiden Name Louise Ann Andrade6. Age (or date of birth) 259. Age (or date of birth) 207. Birthplace Massachusetts10. Birthplace MassachusettsDate Filed August 20, 1959Volume 59Page 064515

Item(s) Amended - - - - - Date Amended - - - - -

Date Issued March 18, 1996

This is to certify that this is a true and correct abstract of the official record filed in this office.

0026115

A. Torrey McLean
State Registrar

Any alteration or change voids this certificate. Do not accept unless on security paper with Vital Records seal clearly embossed in left corner.

